UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

| SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC., | § § | Case No. 3:20-cv-00451-CEA-DCP |
|--|----------|--------------------------------|
| Plaintiffs, | § § | |
| v. | § § | Jury Demand |
| BROADCOM INC.; BROCADE | § | |
| COMMUNICATIONS SYSTEMS LLC; | § | |
| AND EXTREME NETWORKS, INC., | § | |
| | § | |
| Defendants. | § | |
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PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

COME NOW the Plaintiffs, SNMP Research, Inc. ("SNMP Research") and SNMP Research International, Inc. ("SNMP International" and, together with SNMP Research, "Plaintiffs"), by and through counsel, pursuant to Rule 5.2 of the Federal Rules of Civil Procedure and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], hereby seek leave of this Court to submit certain documents under seal.

Plaintiffs move for leave to file under seal Collective Exhibit 1 and Collective Exhibit 2 to the Declaration of Rameen J. Nasrollahi (the "Nasrollahi Declaration"), which are true and accurate copies of certain financial documents produced by Extreme Networks, Inc. ("Extreme") in this matter. These exhibits include documents Bates-numbered EXTREME-00722215; EXTREME-00722446; EXTREME-00722447; EXTREME-00722448; EXTREME-00722450; EXTREME-00722451; EXTREME-00871502; EXTREME-00871503; EXTREME-01290740; EXTREME-01290741; EXTREME-01290742; EXTREME-01290743; EXTREME-01290744; EXTREME-01407577;

EXTREME-01407578; and EXTREME-01407580 (collectively, the "Financial Documents"). These

documents are being filed manually due to their format and size.

In light of Extreme's designation of the Financial Documents as OUTSIDE COUNSEL EYES

ONLY ("OCEO"), counsel for Plaintiffs has contacted counsel for Extreme, citing the Bates numbers of

the Financial Documents and asked whether Extreme believes that any of this information must be filed

under seal. Counsel for Extreme has responded that all of the Financial Documents should be filed under

seal. Accordingly, Plaintiffs move to file Collective Exhibit 1 and Collective Exhibit 2 to the Nasrollahi

Declaration under seal. In doing so, Plaintiffs clarify that they are moving to seal these documents at

Extreme's direction, and do not agree that sealing the items or that the designation of the Financial

Documents as OCEO is proper.

Respectfully submitted,

Dated: March 20, 2024

By: /s/ Rameen J. Nasrollahi

John L. Wood, Esq. (BPR #027642)

Cheryl G. Rice, Esq. (BPR #021145)

Rameen J. Nasrollahi, Esq. (BPR #033458)

EGERTON, McAFEE, ARMISTEAD & DAVIS, P.C.

900 S. Gay Street, Suite 1400

P.O. Box 2047

Knoxville, TN 37902

(865) 546-0500 (phone)

(865) 525-5293 (facsimile)

jwood@emlaw.com

crice@emlaw.com

rnasrollahi@emlaw.com

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By: /s/ A. Matthew Ashley

A. Matthew Ashley (CA Bar. No. 198235)
Morgan Chu (CA Bar. No. 70446)
David Nimmer (CA Bar. No. 97170)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010 (phone)
(310) 203-7199 (facsimile)
mchu@irell.com
dnimmer@irell.com
mashley@irell.com

By: /s/ Olivia L. Weber

Olivia L. Weber (CA Bar. No. 319918)
BIENERT KATZMAN LITTRELL WILLIAMS, LLP
903 Calle Amanecer, Suite 350
San Clemente, CA 92673
(949) 369-3700 (phone)
(949) 369-3701 (facsimile)
oweber@bklwlaw.com

Attorneys for Plaintiffs

SNMP Research International, Inc. and
SNMP Research, Inc.